

Thank you. My name is Hal Covey. I am from Marysville and I own Covey's Auto Parts. It's a wrecking yard. I have written down some things that I felt were concerns of mine after reading some of the information that your office sent out to us and also after talking with some of the people in Olympia. I have some troubles with some of the requirements and I just want to mention them for the record. It's not the first time I've mentioned these for the record. That's why I wrote them down because I sometime forget some of them. And some of these I'll probably read because I'm not used to public speaking, I'm a wrecker. I'm not talking to individuals or talking to you across the counter. The first minimum requirement proposed in this new permit will add an additional cost to my business and to our industry every year. Just penciling it out, I figured that it will cost me a minimum of \$2,000 a year in my business. A like amount will be costing you. There are others who are affected by this \$2,000 a year. That doesn't count necessarily the costs of testing and my continuing to run around. There's a cost of trying to figure out when I've got 1/10 of 1 inch of rainfall. I have to become a weather man. I have to, in my business, I go from Bellingham to Portland to buy my inventory. So when it says I've got a one hour time limit to do testing that means wherever I'm at, I've got to drop what I'm doing just because it may have somehow rained at least 1/10 of an inch where I'm at, but in Marysville it hasn't rained a drop. So you can understand some of those things that concern me with regards to that. I also noticed that of the \$2,000 a year, it would be equal to a B&O tax where somebody's doing \$425,000 a year. Next is the fact that my business must compete with others who don't do any of the stormwater runoff. I'm speaking here mostly of unlicensed or illegal wreckers. There are probably more of those in this state than there are licensed businesses. In fact, at the public auctions where I buy my inventory, 60 to 70% of all the automobiles that are there are bought by people other than myself or other wreckers like myself. They are purchased by a guy who decides he's coming in to buy a car to fix up, a number of people who do it as business, or really illegal wreckers. And you see the state isn't concerned about them. They don't have to follow any of these requirements. They do penalize me if I happen to cross the line. I'm not saying the line is necessarily so rigid that we can't step across it once in a while. You see these people, they're not concerned with the ____ oil they drain on the ground, what gasoline happens to go there, what Freon is put out in the air. From this state, I can speak from experience that the records of this state are probably as concerned about the environment as anybody around. And the environmental people in this state know that. But we feel like we're being penalized when additional regulations are placed on us. Sorry, got to kind of look at my notes. The other thing about the illegal wreckers is these other businesses, or these other individuals, they don't have any records they have to keep, and they don't pay any state taxes, and they don't pay any license fees, and they're not regulated. You might think that I'm whining. But I'm not really. I mean you can look around in this room and I would venture to say that there's not a one of you that would come and buy my business today, for what we make today because of the environmental and regulatory kinds of things that are placed on our business today. No one's willing to do it any more. I can remember back years ago, anybody would go out and buy one. But because of all the regulations today, they won't do it. It's not worth the hassle. In fact, in the last month, this last month, my very friends took his license and mailed it back to state. Said I can't afford another 2,000, 3,000, 4,000 dollars in regulations to keep up with regulations. Not only that, we have two other big organizations in this state, if this passes the way or this regulation goes into effect the way it is, they'll wrap up and lock their doors. They're not small outfits, they're big outfits. You can't afford to be in business when you're regulated. What I would like to see is (I lost my place) how am I supposed to identify the receiving waters, the stormwaters and runoff? And I understand, EPA will help me figure that out. Now I have a piece of property which is an acre. It's all concrete. You don't see wrecking yards with concrete decks. I do. I have two water separators on that piece of property. I have five drains all together and I have what we call the well. That's where the water drains off the, it's really a septic system more than a well. In fact, I don't even know how I'm going to test it. In fact, the people I've talked to so far told me they don't know how they're going to test it either or how we test it either. The testing, that's another issue. You know the one hour limit, I think that should be really looked at real hard. A one hour limit really isn't going to work in most of cases when we're two or three hours away from where our business is buying inventory. I buy inventory four days a week. I'm gone from my offices four days a week just to buy inventory. The fifth day if I was lucky I would stay away, but I have to work. The wording even if it was one hour or whenever reasonably possible, you know, would be better than having a stiff one hour regulation. I know the federal, I think the federal has a pretty stiff rule on that that you have to comply with. But I think we have in this state have flexibility to modify it to work for us. In conclusion, the compliance of government regulations must be a competitive advantage. I'm going to say that again. Compliance with government regulations must be a competitive advantage. In most cases, it's not. My illegal competitors who buy most of the cars won't comply with this regulation or any of the other regulations that I have to. If you can't force my competitors to comply, you shouldn't force me to comply. I'll be watching you to do that. If you don't make my illegal competitors comply, I might as well join them and avoid all these requirements. Just like all the rest of them do. I know it's not really the best way out because you're always have an advantage if you're on the inside working out. Not from the outside trying to work in. I don't see any other notes. For the record, I had to come and state it. Thank you very much for your time.